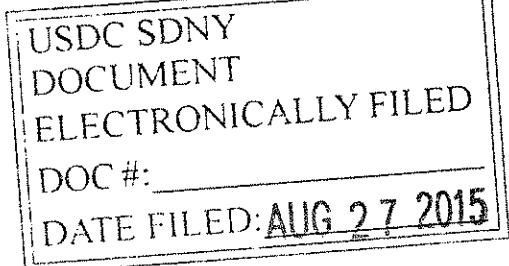


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :
:
:
- v. - :
:
:
AHMED MOHAMMED EL GAMMAL, :
a/k/a "Jammie Gammal," :
Defendant. :
----- X
COUNT ONE :
The Grand Jury charges:

JUDGE RAMOS

15^{15-CR} CRIM 588



1. From at least in or about 2014, up to and including in or about August 2015, in the Southern District of New York and elsewhere, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, together with others, did knowingly and intentionally provide, and did attempt to provide, "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including, among other things, personnel, to a foreign terrorist organization, to wit, the Islamic State of Iraq and the Levant ("ISIL"), which has been designated by the Secretary of State as a foreign terrorist organization since 2004, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing of this Indictment, knowing that ISIL was a designated foreign terrorist

organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), and did aid and abet the same.

(Title 18, United States Code, Sections 2339B and 2.)

COUNT TWO

The Grand Jury further charges:

2. From at least in or about 2014, up to and including in or about August 2015, in the Southern District of New York and elsewhere, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, together with others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, namely, ISIL, which has been designated by the Secretary of State as a foreign terrorist organization since 2004, pursuant to Section 219 of the INA, and is currently designated as such as of the date of the filing of this Indictment.

3. It was part and an object of the conspiracy that AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant,

and others known and unknown, would and did provide ISIL with material support and resources, including, among other things, personnel, knowing that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 7, 2014, while in Manhattan, New York, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, contacted a co-conspirator not named as a defendant herein ("CC-1").

b. On or about January 16, 2015, while in Orange County, New York, CC-1 communicated with a co-conspirator not named as a defendant herein ("CC-2") through social media regarding CC-1's plans to join ISIL.

c. On January 27, 2015, CC-1 traveled from New York City to Istanbul, Turkey.

d. In early 2015, CC-1 received military style training from ISIL in Syria.

e. On or about May 7, 2015, CC-1 contacted EL GAMMAL from Syria to inform EL GAMMAL that "everything is going according to plan," among other things.

(Title 18, United States Code, Section 2339B.)

COUNT THREE

(Receiving Military-Type Training from a Designated Foreign Terrorist Organization)

The Grand Jury further charges:

5. From at least in or about 2014, up to and including in or about August 2015, in the Southern District of New York and elsewhere, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, together with others, did knowingly and intentionally aid and abet the receipt of military-type training, as defined in Title 18, United States Code, Section 2339B(c)(1), from a foreign terrorist organization, to wit, ISIL, which has been designated by the Secretary of State as a foreign terrorist organization since 2004, pursuant to Section 219 of the INA, knowing that ISIL was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has

engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339D and 2.)

COUNT FOUR

(Conspiracy to Receive Military-Type Training from a Designated Foreign Terrorist Organization)

The Grand Jury further charges:

6. From at least in or about 2014, up to and including in or about August 2015, in the Southern District of New York and elsewhere, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, together with others known and unknown, did knowingly combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 2339D.

7. It was a part and an object of the conspiracy that another person would and did knowingly receive military-type training, as defined in Title 18, United States Code, Section 2339B(c)(1), from a foreign terrorist organization, to wit, ISIL, which has been designated by the Secretary of State as a foreign terrorist organization since 2004, pursuant to Section 219 of the INA, knowing that ISIL was a designated

foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIL engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIL engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

Overt Acts

8. In furtherance of the conspiracy and to effect the illegal object thereof, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, and others known and unknown, committed the overt acts previously alleged in paragraph 4 above, which are incorporated by reference herein as if set forth here in full, among others.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATIONS

9. The allegations contained in Counts One through Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(G), and Title 28, United States Code, Section 2461(c).

10. The violations of Title 18, United States Code, Section 2339B alleged in Counts One and Two of this Indictment, and of Title 18, United States Code, Section 2339D alleged in Count Three of this Indictment are Federal crimes of terrorism,

as defined in 18 U.S.C. § 2332b(g)(5), against the United States, citizens and residents of the United States, and their property.

11. AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, was an individual engaged in planning and perpetrating a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property.

12. Upon conviction of any of the offenses in violation of Title 18, United States Code, Sections 2339B and 2339D alleged in Counts One, Two, and Three of this Indictment, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G)(i), and Title 28, United States Code, Section 2461(c), all right, title, and interest in all assets, foreign and domestic, derived from, involved in, and used and intended to be used to commit a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property.

13. Upon conviction of any of the offenses in violation of Title 18, United States Code, Sections 2339B and 2339D alleged in Counts One, Two, and Three of this Indictment, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, shall pay to the United States, pursuant to Title 18, United

States Code, Section 981(a)(1)(G), and Title 28, United States Code, Section 2461(c), a money judgment equal to the value of the assets subject to forfeiture under Paragraph 12 above.

(Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c).)



C.J. Boor
FOREPERSON



Preet Bharara
PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

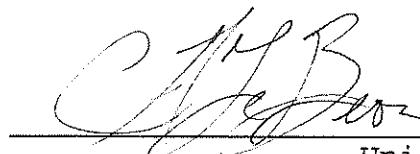
AHMED MOHAMMED EL GAMMAL,
a/k/a "Jammie Gammal,"

Defendant.

INDICTMENT

15 Cr.

(18 U.S.C. §§ 2, 371, 2339B, and 2339D.)



PREET BHARARA
United States Attorney.

A TRUE BILL

Foreperson.

8/27/15 Filed in Docket, Case assigned to J. Ramos

COT/JWMJ